

# EXHIBIT B

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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|                               |   |                      |
|-------------------------------|---|----------------------|
| IN THE MATTER OF              | ) |                      |
|                               | ) |                      |
| IN RE BAIR HUGGER FORCED AIR  | ) |                      |
| WARMING                       | ) |                      |
| PRODUCTS LIABILITY LITIGATION | ) |                      |
|                               | ) |                      |
| Plaintiff,                    | ) |                      |
|                               | ) | PRETRIAL ORDER NO: 7 |
| v.                            | ) | Protective Order     |
|                               | ) | MDL No. 15-2666      |
| 3M COMPANY AND ARIZANT        | ) | (JNE/FLN)            |
| HEALTHCARE INC.               | ) |                      |
| Defendant.                    | ) |                      |

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DEPOSITION OF PAUL MCGOVERN  
VOLUME II  
Thursday, January 5, 2017  
AT: FAEGRE BAKER DANIELS LLP  
Taken at:  
7 Pilgrim Street  
London EC4V 6LB  
United Kingdom

Court Reporter:  
Louise Pepper: Accredited Real-time Reporter  
Videographer: Simon Addinsell

JOB NO. 117121

A P P E A R A N C E S

Appearing for the Plaintiff:

MR. MICHAEL SACCHET  
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GENEVIEVE ZIMMERMAN  
MESHBESHER & SPENCE  
1616 Park Avenue  
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Appearing for the Defendant:

MR. COREY GORDON  
BLACKWELL BURKE  
431 South Seventh Street  
Minneapolis, MN 55415

MS. KATHERINE NEWMAN  
FAEGRE BAKER DANIELS  
7 Pilgrim Street, London EC4V 6LB

Appearing for the Witness:

MR. ANDREW HEAD  
MR. BRYAN SHACKLADY  
FORSTERS  
31 Hill Street  
London W1J 5LS

1 DR. PAUL MCGOVERN

2 Q. And this particular sentence was published in final  
3 form, as it says in this paper?

4 A. This sentence, as part of this paper, was  
5 peer-reviewed and approved for publication.

6 Q. Do you have any reason to doubt the bubble count  
7 results of the McGovern paper?

8 A. I do not.

9 Q. You did not receive any compensation from Augustine  
10 Biomedical & Design, or any of its predecessor entities,  
11 with respect to conducting this study?

12 A. No.

13 Q. In fact, it cost you a sum of money to conduct this  
14 study?

15 A. Overall, this study -- the conducting of this study  
16 involved me working at weekends in my own hours, traveling  
17 to and from the hospital on my own time, and at my own  
18 expense. There were -- some equipment was purchased, and at  
19 the time, I received expenses for that equipment to be  
20 purchased, I did -- but I received that from the healthcare  
21 trust that I worked for. I did not receive any money  
22 directly from Augustine at this time for this paper, to my  
23 knowledge.

24 Q. The fact that Mr. Albrecht may have been employed  
25 by Augustine Biomedical & Design, or any of its predecessor